

**UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF WASHINGTON
AT SEATTLE**

STATE OF WASHINGTON, et al.,

Plaintiffs,

v.

DONALD J. TRUMP, in his official
capacity as President of the United States of
America, et al.,

Defendants.

NO.

DECLARATION OF
KYLE S. KARINEN

DECLARATION OF KYLE S. KARINEN

ATTORNEY GENERAL OF WASHINGTON
Complex Litigation Division
800 Fifth Avenue, Suite 2000
Seattle, WA 98104
(206) 464-7744

1 I, Kyle S. Karinen, declare as follows:

2 1. I am over the age of 18, competent to testify as to the matters herein, and make
3 this declaration based on my personal knowledge.

4 2. I am the Executive Director for the Washington Medical Commission
5 (Commission) and have served in this role since September 1, 2023. I previously served as
6 Supervising Staff Attorney for the Commission since 2018, before which I was employed with
7 the Washington State Department of Health starting in 2011. I am a trained lawyer and an active
8 member in good standing of the Washington State Bar Association. I was hired by the
9 Commission pursuant to section 18.71.430(1) of the Revised Code of Washington and am
10 responsible for the overall management of Commission staff and operations, including, but not
11 limited to, performing all administrative duties and any other duties as delegated by the
12 Commission.

13 3. The Commission is a 21-member body established under Washington state law,
14 Wash. Rev. Code § 18.71.015, and delegated authority under Wash. Rev. Code § 18.71 to license
15 and regulate allopathic physicians and physician assistants, establish and enforce qualifications
16 for licensure and standards of practice, and educate practitioners and the public.

17 4. The Commission disciplines license holders for unprofessional conduct under the
18 Uniform Disciplinary Act, Wash. Rev. Code § 18.130. Unprofessional conduct includes the
19 conduct, acts, and conditions listed in Wash. Rev. Code § 18.130.180.

20 5. Under Washington law, the provision of gender-affirming care, such as puberty-
21 blocking medication, hormone therapy, and gender-affirming surgeries, within the standard of
22 care, is not unprofessional conduct. In fact, the Uniform Disciplinary Act,
23 Wash. Rev. Code § 18.130.450, expressly provides that “[t]he provision of, authorization of,
24 recommendation of, aiding in, assistance in, referral for, or other participation in any . . . gender-
25 affirming treatment consistent with the standard of care in Washington by a license holder” is
26 not unprofessional conduct.

1 6. The provision of gender-affirming care is expressly protected under the Uniform
2 Disciplinary Act and does not constitute female genital mutilation. The commission of female
3 genital mutilation on a minor is deemed unprofessional conduct under the Uniform Disciplinary
4 Act, Wash. Rev. Code § 18.130.180(28).

5 I declare under penalty of perjury under the laws of the State of Washington and the
6 United States of America that the foregoing is true and correct.

7 DATED this 5th day of February 2025, at Tumwater, WA.

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10 KYLE S. KARINEN
11 Executive Director
12 Washington Medical Commission
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